

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTERS OF:

**Call Us Leasing Inc.
106 Hastings Avenue
Newport, MN 55055**

**Call Us Logistics, Inc.
106 Hastings Avenue
Newport, MN 55055**

**FIRST INTERIM RESPONSES TO
REQUEST TO PROVIDE
INFORMATION PURSUANT TO THE
CLEAN AIR ACT**

Pursuant to Section 208(a) of the Clean Air Act, 42 U.S.C. § 7542(a), Call Us Leasing Inc. and Call Us Logistics, Inc. (collectively, "Call Us") provide the following responses to the Request to Provide Information Pursuant to the Clean Air Act received from the U.S. Environmental Protection Agency on April 9, 2018. Call Us reserves the right to supplement and modify these responses based upon further investigation.

REQUESTS

Request No. 1: Provide an unlocked, electronic spreadsheet that lists each heavy-duty diesel vehicle (i.e., those vehicles with a gross vehicle weight rating greater than 8,500 pounds) currently owned, operated, and/or leased by Call Us (at all facility locations). For each vehicle, provide the following:

- (a) Any vehicle identification number used by Call Us;
- (b) Vehicle identification number (VIN);
- (c) Engine make, model, year, size, and horsepower;
- (d) Chassis make, model, and year and;
- (e) The owner and operator of each vehicle.

Response:

- (a) See Spreadsheet No. 1.

- (b) See Spreadsheet No. 1.
- (c) See Spreadsheet No. 1.
- (d) See Spreadsheet No. 1.
- (e) See Spreadsheet No. 1.

Request No. 2: Answer the following questions with a "yes" or a "no" followed by a brief explanation:

- (a) Do you offer maintenance services to vehicles and/or engines outside of your fleet?
- (b) Are your fleet vehicles ever serviced outside of your facilities? If yes, where and how often are they serviced outside of your facilities?

Response:

- (a) No. Only limited maintenance services are provided internally to trucks in the fleet.
- (b) Yes. They are serviced as needed while out on the road. These services are provided by a variety of different vendors based on location and availability.

Request No. 3: For each vehicle listed in response to Request 1, identify those vehicles operating (either currently or previously) with one or more modified emission control components and/or one or more tuners. Modifications include, but are not limited to, the bypass, defeat, disconnection, removal (in part or in whole), or rendering inoperative in any way the: DPF; EGR; OBD; SCR; catalyst; and/or any fluid, sensor, signal, component, and/or control system associated with those emission control components. In the same spreadsheet provided in response to Request 1, provide the following for each vehicle identified in response to this Request:

- (a) Current mileage;
- (b) Miles travelled and gallons of fuel consumed in calendar year 2017;
- (c) List of any and all modifications to the vehicle's emissions control components and all parties involved in providing the modifications; and
- (d) List of any and all tuners used or installed, including the following:
 - i. The make and model of each tuner and all parties involved in providing the tuning;
 - ii. If the tuner allows for modifications to emission control components as described in Request 2, in that it enables a modified vehicle or engine to

operate without displaying a MIL, prompting a DTC, or causing engine derating, specify which emission control component(s) it addresses; and

- iii. If the tuner alters fuel timing maps, fuel pressure, injection timing, and/or injection pulse widths, specify which parameters it affects, or if not known, describe the anticipated gains from the tuner, such as increased horsepower, fuel economy, or torque.

Response: None of the vehicles has been modified with one or more modified emission control components and/or one or more tuners or any item described in this request. Therefore, Spreadsheet No. 1 reflects "none" under "Mods" for each vehicle.

Request No. 4: Provide all documents, including invoices, purchase orders, receipts, and maintenance records dated from February 1, 2015 to the date of this request related in any way to the following:

- (a) Any action to bypass, defeat, remove, disconnect, or render inoperative in any way of any and all emission control components and related systems (including their associated fluid, sensors, signals, components, and/or control systems);
- (b) Purchase, installation, and/or repair of any and all tuners that allow for the modification of emission control components and related systems as described in Request 3 (d)(ii); and
- (c) Purchase, installation, and/or repair of any and all tuners that modify injection timing, fuel pressure, and/or injector pulse width or that have the potential to increase horsepower, fuel-efficiency, and/or torque.

For each of the documents identified in response to this Request, include a list of all parties and/or entities involved in performing the actions described in (a) through (c).

Response: None. Call Us has never possessed any documents responsive to this request.

Request No. 5: For parts, components, or modifications identified in response to Requests 3 and 4, state whether you or any other entity conducted tests measuring emissions of hydrocarbon (HC), carbon monoxide (CO), nitrogen Oxide (NO_x), and/or particulate matter (PM), including tests that measure the impact of the part or component on a vehicle's emission control components or elements of design. For each test, provide the following:

- (a) A description of the test, including: identification of the part or component and vehicle; the EPA engine family; name of the vehicle; test equipment; test protocols, and calibration procedures;
- (b) A sample test report and any training or instructional materials used for educating employees and affiliated persons about how to perform the test;

- (c) The date and location of the test, the name and position of the person who conducted the test, and the test results; and
- (d) A copy of any California Air Resources Board Executive Order for the part or component.

Response: Call Us has not tested or obtained any such testing.

- (a) Not applicable.
- (b) Not applicable.
- (c) Not applicable.
- (d) Not applicable.

Request No. 6: In an electronic, unlocked spreadsheet, identify each part, component, or service manufactured (*i.e.*, created, wrote, programmed, fabricated, produced, or modified), purchased, offered for sale, sold, or installed by Call Us including, but not limited to: engine parts; power packages; computer tuning; calibration; element of design; tuner; software coding; or device, that:

- (a) Changes, affects, modifies, or bypasses a vehicle's emission related parts including, but not limited to: the DPF system; EGR system; catalyst system; OBD; SCR; or sensors, signals, or records related to these systems;
- (b) Simulates the operation of any emission related parts including, but not limited to: the DPF system; EGR system; catalyst; OBD; SCR; or sensors, signals, or records related to these systems;
- (c) Can be programed to modify engine operating or emission control parameters or OBD functions including, but not limited to, those parameters sensed or controlled by the ECM; and
- (d) Has the effect of permanently or temporarily changing, affecting, bypassing, defeating, or rendering inoperative any emission control device, element of design, or emission related part.

If you did not manufacture an identified part or component, provide the name and address of the manufacturer in addition to the information listed in Request 6(a)-6(d).

Response: None.

- (a) No applicable.

- (b) Not applicable.
- (c) Not applicable.
- (d) Not applicable.

Request No. 7: In an electronic, unlocked spreadsheet, for each part, component, or service that is identified in response to Request 6, identify whether the:

- (a) Part or component is capable of disabling or allowing the removal of the EGR without illuminating a MIL or prompting any on-board diagnostic trouble code;
- (b) Product is capable of altering the EGR, mass air flow, or charge air flow calibration maps;
- (c) Product is capable of allowing removal of a DPF without illuminating a MIL or prompting any DTC;
- (d) Product is capable of allowing removal of a DOC without illuminating a prompting any DTC;
- (e) Product is capable of allowing removal of any component of the SCR system without illuminating a MIL or prompting any DTC;
- (f) Product is capable of preventing the engine or vehicle from being derated or allows the vehicle to be restarted if disabled when the DEF tank is empty, poor quality DEP is present or any parts of the SCR system have been disabled;
- (g) Product is capable of altering diesel fuel injection calibration maps to increasing fuel quantity, modify injection timing and injection pressure;
- (h) Product is capable of bypassing or altering parameters to prevent DTCs or MILs from being recorded or illuminated;
- (i) Product is capable of allowing removal or disabling of oxygen sensors or allows for increased use of open loop fuel control on gasoline vehicles;
- (j) Product is capable of allowing the removal of catalysts on gasoline fueled vehicles; and
- (k) Product is capable of altering fuel injection or spark timing parameters for gasoline fueled vehicles.

Response: None.

- (a) Not applicable.
- (b) Not applicable.
- (c) Not applicable.
- (d) Not applicable.
- (e) Not applicable.
- (f) Not applicable.
- (g) Not applicable.
- (h) Not applicable.
- (i) Not applicable.
- (j) Not applicable.
- (k) Not applicable.

Request No. 8: In an electronic, unlocked spreadsheet, for each part, component, or service identified in response to Requests 6 and 7 above, provide the following information:

- (a) The part number or component part number and the identifying name, and the manufacturer's or supplier's part number or component part number and identifying name;
- (b) The vehicle applications by make, model, engine types, and year;
- (c) A description of what the part or component does and how it operates;
- (d) The quantity that was manufactured, purchased, and/or imported by you each calendar year;
- (e) The quantity that was sold or offered for sale by you, by calendar year;
- (f) The quantity that was installed by you, by calendar year; and
- (g) The records/reports of any emissions testing conducted by you or any other entity regarding any effect on vehicle emissions for any of the parts and components.

Response: None.

- (a) Not applicable.
- (b) Not applicable.
- (c) Not applicable.
- (d) Not applicable.
- (e) Not applicable.
- (f) Not applicable.
- (g) Not applicable.

Request No. 9: For any tests identified in response to Request 8.g above, provide the following information:

- (a) A description of the test, including identification of the component and vehicle, EPA engine family, name of the vehicle, test equipment, test protocols, and calibration procedures;
- (b) A copy of the test report which includes the date and location of the test, the name and position of the person that conducted the test, and the test results; and
- (c) The date and location of the test, the name and position of the person who conducted the test, and the test results.

Response: None.

- (a) Not applicable.
- (b) Not applicable.
- (c) Not applicable.

Request No. 10: For each part, component, or service identified in Requests 6 through 8 above, if not already provided in Request 4 provide the following documents from February 1, 2015 to the date of this request:

- (a) Copies of your advertisements to sell, distribute, or install each part or component, including advertisements on websites and in other media;

- (b) Copies of any installation or operation instructions, guides, or manuals;
- (c) Copies of all receipts or invoices for all parts or components purchased by you;
- (d) Copies of all receipts or invoices for all parts or components sold by you; and
- (e) Copies of all receipts or invoices for all part or components installed by you.

Response: None.

- (a) Not applicable.
- (b) Not applicable.
- (c) Not applicable.
- (d) Not applicable.
- (e) Not applicable.

Request No. 11: Describe the relationship between Call Us Leasing Inc. and Call Us Logistics, Inc.

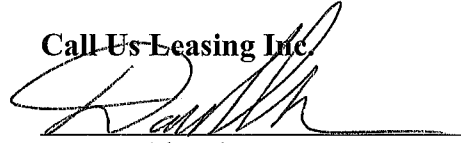
Response: Call Us Leasing Inc. leases trucks to Call Us Logistics, Inc., which operates the trucks. The relationship is that of an exclusive lessor/lessee arrangement.

Request No. 12: Identify all persons consulted in responding to this Request for Information, including his/her title(s) and relationship to Call Us (e.g., employee, contractor, etc.), the request(s) to which each individual and entity (Call Us Leasing Inc. or Call Us Logistics, Inc.) responded, and the period of time for which each individual is providing a response.

Response: David Quade (Owner) and David Nelson (Non-employee contractor serving as manager for both Call Us entities) collaborated to respond to all requests for all time periods encompassed by these requests.

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to 18 U.S.C. §§ 1001 and 1341.

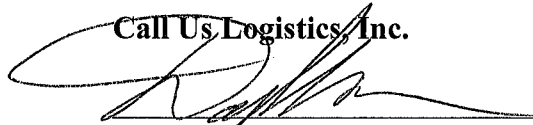
~~Call Us Leasing Inc.~~



By: David Nelson

Its: Agent

~~Call Us Logistics, Inc.~~



By: David Nelson

Its: Agent